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October 27, 2017

BY ECF

Honorable Edgardo Ramos  
United States District Court  
United States Courthouse  
40 Foley Square  
New York, NY 10007-1312

Re: 1:17-cv-8-VEC Galeana v. Szechuan Restaurant of Columbus, Inc.

Your Honor:

I am an attorney with the office of Michael Faillace & Associates, attorneys for Plaintiffs in the above-referenced matter. The parties write jointly to: (a) respectfully request that discovery in this matter be extended from today to December 29, 2017; and (b) respectfully request that the status conference presently scheduled for October 31, 2017 be adjourned to a date on or after December 29, 2017.

The requested extension is necessary because Ms. Helen Wu, attorney for the individual Defendant herein, has recently left the law firm of Wong, Wong & Associates, requiring that the parties have additional time to conclude discovery activity. Alternate defense counsel from Wong, Wong & Associates anticipates filing a notice of appearance shortly. The requested discovery extension should permit the parties to conclude all discovery activity promptly.

The parties thank the Court for its time and attention.

Respectfully Submitted,

/s/  
Shawn R. Clark, Esq [LF1102]  
Michael Faillace & Associates, P.C.  
Attorneys for Plaintiffs